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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 NATHANIAL JOHNSON,  
15 *Plaintiff*

Case No.  
2:11-CV-1858-KJD-VCF

16 v.

17 DOE KELLY; DOE TERRIQUEZ; C.O. DOE  
18 FLIPPO; LT. DOE SUEY; CAPT. DOE  
19 DONAHUE; DEPUTY CHIEF DOE VARNER;  
20 C.O. DOE JOYCE; NURSE DOE MITEAL;  
21 *Defendants*

**STIPULATION AND ORDER TO  
EXTEND TIME TO SUBMIT  
RESPONSES TO RENEWED  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
(First Request)**

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23 IT IS HEREBY STIPULATED between and among Plaintiff NATHANIAL JOHNSON, JR.  
24 (“Plaintiff” or “Johnson”) and Defendants DONOHUE, FLIPPO, KELLY, SUEY, TERRIQUEZ and  
25 VARNER (collectively, “LVMPD Defendants”) to extend the time for Plaintiff to respond to  
26 Defendants’ Renewed Motion for Partial Summary Judgment, filed with this Court on February 11,  
27 2015 as Docket No. 70. The parties jointly stipulate that Plaintiff’s time to respond shall be  
28 extended to **Friday, March 6, 2015**. Pursuant to LR 6-1, the parties aver that while this Court  
previously granted one (1) stipulation to extend the discovery deadline by ninety (90) days (Docs. 57  
& 58) after the appearance of Plaintiff’s counsel on March 31, 2013 (Doc. 45), this is the first such  
request with respect to a dispositive motion in this case. The parties agree to this extension in the  
interests of cordiality and professional courtesy, as Plaintiff’s counsel has overlapping deadlines in

1 other cases and needs additional time to ensure a cogent response. The parties represent that this  
2 stipulation is not entered into by either party for the purposes of undue delay.

3 Respectfully submitted this 2<sup>nd</sup> day of March, 2015.

4  
5 THE DANIEL FIRM

OLSON CANNON, GORMLEY, ANGULOR  
& STOBERSKI

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7  
8 /s/ Scott R. Daniel, Esq.  
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*Donohue, Flippo, Kelly, Suey,*  
*Terriquez & Varner*

15 **IT IS SO ORDERED**

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United States District Court Judge

19 Dated: March 3, 2015  
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